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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of the Commission's
Rules to Establish New Personal
Communications Services

) GEN Docket No. 90-314
) ET Docket No. 92-100
)
) RM-7140, RM-7175, RM-7617,
) RM-7618, RM-7760, RM-7782,
) RM-7860, RM-7977, RM-7978,
) RM-7979, RM-7980
)
) PP-35 through PP-40, PP-79
) through PP-85

COMMENTS OF
THE SOUTH CAROLINA TELEPHONE ASSOCIATION

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SUMMARY

The South Carolina Telephone Association ("SCTA") encourages the Commission to adopt a personal communications services ("PCS") definition that includes specific characteristics which would distinguish PCS as a unique service offering.

The Commission should allocate for PCS five licensed channel sets of 20 MHz each in the 2 GHz band, an additional 20 MHz for unlicensed wideband applications and 20 MHz for unlicensed narrowband uses.

SCTA maintains that it is imperative that PCS geographic service areas be MSAs and RSAs. Unlike the options set forth in the Notice, MSAs and RSAs take into account the difference between metropolitan and non-metropolitan areas and will encourage broader participation and greater diversity in the provision of PCS.

Local exchange carriers should be eligible to provide PCS in their exchange service areas. Indeed, not only will their participation allow them to fulfill their universal service obligations, but also it will enhance the deployment of PCS and benefit customers. Also, a local exchange carrier's cellular holdings should not be a bar to eligibility as a PCS licensee. It would be illogical to find on the one hand that local exchange carrier participation is in the public interest and then to impose

on the other hand a restriction that precludes local exchange carriers with any cellular interests from providing PCS. Finally, the Commission should allocate a spectrum reserve out of one of the licensed 20 MHz frequency blocks for local exchange carriers in RSAs and for smaller local exchange carriers operating in outlying areas of MSAs. Such a reserve would help to assure that non-metropolitan areas do not suffer adverse consequences from a lack of technological developments and that local exchange carriers serving those areas are not similarly adversely affected.

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**COMMENTS OF
THE SOUTH CAROLINA TELEPHONE ASSOCIATION**

The South Carolina Telephone Association ("SCTA") hereby submits its comments in response to the Commission's Notice of Proposed Rule Making and Tentative Decision in the captioned proceeding, FCC 92-333, released August 14, 1992 ("Notice"). SCTA, an organization of all 28 of the local exchange carriers providing exchange telephone service in South Carolina, has participated in this proceeding by filing Comments and Reply Comments in the initial phase of this proceeding.

As stated more fully below, SCTA continues to advocate the rapid deployment of personal communications services ("PCS") technology and the full participation of local exchange carriers as fostering the goals of the Commission and the Communications Act.

I. PCS Definition

The Commission proposed that PCS be defined as "a family of mobile or portable radio communications services which could

provide services to individuals and businesses, and be integrated with a variety of competing networks."¹ PCS promises to offer the public unique and specific characteristics which should be incorporated into a service definition adopted by the Commission. SCTA believes that the Commission should adopt a definition of PCS that includes the following characteristics:

- (1) provision of a family of person-specific rather than location-specific services;
- (2) utilization of a portable, wireless device employing low power and a common air interface to originate and receive communications;
- (3) employment of a callable number for each subscriber of the service that allows that subscriber to be called regardless of the geographic location;
- (4) have the capability to interconnect with the public switched telephone network; and
- (5) offering of a set of basic features that assure that the same functions are similarly performed at all PCS locations.

Such a definition would distinguish PCS as a new, competitive and unique service offering. While PCS is envisioned to be competitive with certain aspects of cellular and other services, it has unique characteristics that should be recognized. Embodiment of the above criteria would assure that PCS technology is offered to the public in ways that fulfill the Commission's public interest

¹Notice at para. 29.

obligations under the Communications Act. In that way, the Commission will ensure that limited spectrum resources will be used to provide the highest level of personal communications and benefit the broadest range of customers.

II. Spectrum Allocations

An adequate amount of spectrum should be allocated for PCS. The Commission stated that its goal is to provide a frequency allocation that allows for the provision of the widest range of PCS services at the lowest cost to consumers.² SCTA recommends that five licensed channel sets of 20 MHz each in the 2 GHz band be allocated for each market. In this way, all such licensees would be permitted to apply for the same amount of spectrum so that they can each offer PCS services on a fully competitive basis. SCTA further advocates that an additional 20 MHz be provided for unlicensed wideband PCS applications and another 20 MHz channel set for unlicensed narrowband PCS applications. These two unlicensed allocations should lead to more expeditious public availability of new PCS technologies and foster a diversity of PCS providers, both large and small.

III. Licensing Issues

A. Geographic Service Areas

The Commission advances four options for the size of PCS license areas, the smallest being 487 "Basic Trading Areas" and the

²Notice at para. 34.

largest being nationwide.³ SCTA contends that all four options involve areas that are unnecessarily large for the nature of the PCS offering. The Commission should look instead to the most appropriate and logical solution, which is the 734 MSA and RSA geographic delineations that the Commission currently uses for cellular service and Interactive Video and Data Service licensing. This position is consistent with Commissioner Quello's statement that the MSA and RSA designations should be seriously considered.⁴

A number of compelling reasons exist for implementing these smaller service areas for PCS. First, PCS technology with its use of microcells provides the capability of tailoring service to such smaller areas and, therefore, licensing of such areas is feasible. Second, they are the only option that recognizes the difference between metropolitan and non-metropolitan areas. Third, MSA and RSA designations will likely encourage broader participation in providing PCS, particularly by entities that are only interested in or have the resources to provide service to small areas. The Commission itself recognizes the likely benefit.⁵ Such participation would likely result in quicker deployment of PCS in non-metropolitan areas of the country. It should also yield greater diversity and broader technical and service innovation than could be expected from a smaller number of regional or nationwide

³Notice at para. 60.

⁴Separate Statement of Commissioner James H. Quello, Re: Amendment of the Commission's Rules to Establish New Personal Communication Services, Erratum, released August 14, 1992.

⁵Notice at para. 59.

providers. The Commission also recognizes this as a potential benefit.⁶ If all of these benefits were realized, they would enhance the Commission's goals for PCS, particularly encouraging competition, deploying new technologies, and universality.

B. Eligibility Requirements

1. Local Exchange Carrier Provision of PCS in their own Service Areas

The Commission tentatively concluded that there is a strong case for allowing local exchange carriers to provide PCS in their own exchange service areas.⁷ SCTA agrees with the Commission's conclusion and urges the Commission to allow local exchange carriers to offer PCS in this manner.

Throughout this proceeding, SCTA has fervently advocated full local exchange carrier participation in PCS.⁸ One of the most compelling arguments for this policy is the universal service obligations of all local exchange carriers. As technological advances have been made in this field, they have been implemented by the local exchange carriers, and have brought the telephone system from its inception using operator-assisted manual switchboards to the present fully automated digital system. The public has benefitted every step of the way. PCS is another new technology that can dramatically improve local exchange service if

⁶Id.

⁷Notice at para. 75.

⁸SCTA Comments and Reply Comments to the Notice of Inquiry.

the local exchange carriers, who are the most qualified and therefore most logical providers, are not prohibited from participation by regulatory constraints. The Commission acknowledged that PCS will likely first complement local exchange service and later become a full fledged competitor.⁹ The local exchange carriers must be allowed to deploy this new technology if they are to continue to meet their universal service obligations.

By their participation in PCS, local exchange carriers will facilitate the rapid availability and economical deployment of PCS due to their resources and expertise. Local exchange carriers have: (1) expertise in providing existing telecommunications services, (2) the infrastructure in place, (3) the financial resources, and (4) the public service commitment to effectively and efficiently bring PCS to the public throughout the nation, in both metropolitan and non-metropolitan areas. Utilization of these resources would foster the Commission's stated goals of universality, speed of deployment and competitive delivery of PCS.

Local exchange carrier provision of PCS would also enhance the utilization of the public switched network by increasing its capability and efficiency. Just as the technological evolution of the network and local exchange service has benefitted both customers and all providers, including local exchange, interexchange and cellular carriers, local exchange carrier participation in the deployment of PCS will enhance these carriers'

⁹Notice at para. 71.

ability to support all PCS providers' needs and facilitate the interoperability of different PCS systems. Development of compatible PCS systems will mean that any PCS customer can use a PCS device from any location. This is critical to the universality of PCS. In addition, local exchange carrier participation and utilization of the exchange network will result in integration of PCS with that network. Such integration will allow PCS customers to utilize many intelligent network features of the public switched network. For all these reasons, local exchange carrier participation will assure that PCS will be brought to the marketplace as quickly as possible.

Local exchange carrier provision of PCS will benefit local exchange customers. As stated above, local exchange carriers have historically implemented new technology as part of their universal service and public interest obligations. This has resulted in not only vast improvements in service and enhanced offerings but also greater efficiencies and lower costs to customers. Deployment of PCS is no exception. It would enable local exchange carriers to operate more efficiently and thereby provide savings for existing and future customers. Also, participation in PCS would help offset possible revenue reduction which could result from customer migration from landline to wireless services. If such losses occur and are not offset, the remaining landline customers would have to cover the fixed service costs. Another aspect of the benefits to customers of allowing local exchange carriers to provide PCS is the virtual assurance that PCS would be offered in non-metropolitan parts of the country. Non-local exchange carrier providers of PCS

will look to serve the most densely populated and more profitable areas first, leaving the isolated and less economically feasible regions unserved. It is vital that PCS be available to these non-metropolitan areas for the residents and businesses, as well as for the economic development of those regions. The local exchange carriers have consistently demonstrated a commitment to service and have both the commitment and the ability to bring PCS to non-metropolitan areas quickly. For this reason, they should be allowed to offer PCS.

Local exchange carrier provision of PCS will also contribute to the competitive delivery of PCS. The level of interest in PCS by local exchange carriers, both large and small, is evidenced by the number of experimental licenses for PCS filed by local exchange carriers and by their participation in this proceeding. This demonstrates that local exchange carriers would deploy PCS in their service areas. In so doing, they would provide expanded service offerings to their customers efficiently and economically. This would also result in opportunities for creative and adaptive PCS offerings. Taken together, these benefits of local exchange carrier provision of PCS should lead to enhanced interest and competition by other providers and assure, as indicated above, that the infrastructure is adequately developed to foster PCS deployment.

In summary, local exchange carrier full participation in the provision of PCS would foster all four of the Commission's stated objectives for PCS.

2. Effect of a Local Exchange Carrier Cellular Holding in the Provision of PCS

In seeking comment on local exchange carrier eligibility for PCS, the Commission refers to a possible bar by virtue of a local exchange carrier's cellular holdings.¹⁰ In the discussion of cellular eligibility, the Commission proposes a severe ownership standard by which no party with an ownership interest exceeding one percent, direct or indirect, in a cellular license could have an ownership interest, direct or indirect, in a PCS license serving the same geographic area.¹¹ The rationale for considering a cellular ownership prohibition for PCS is that cellular licensees could use their existing spectrum to provide PCS and that, if cellular licensees could acquire PCS licenses in their own service area, they could use them to inhibit competition.¹²

The effect of these policies, if adopted, would be to render any local exchange carrier ineligible for a PCS license if it holds virtually any interest in a cellular system serving its exchange area. Such a severe restriction is unwarranted. The Commission should take steps to eliminate this restriction. The PCS eligibility rules should not contain any bar for local exchange carriers that have any cellular interests. This is particularly so because most local exchange carriers' interests in cellular systems are minority interests in limited partnerships. They have no

¹⁰Notice at para. 76.

¹¹Notice at fn. 46.

¹²Notice at paras. 64-66.

management control over the operation of the cellular system. This means that these minority interest local exchange carriers have no access to any cellular spectrum that they could use to offer any type of wireless service to their local serving area. To exclude such carriers from PCS eligibility is particularly severe.

3. A Spectrum Reserve for All Local Exchange Carriers
Operating in RSAs and for Smaller Local Exchange Carriers
Operating in MSAs

SCTA has advocated local exchange carrier participation in PCS as a means of assuring its deployment in all areas of the country. A very real need exists for the telecommunications infrastructure, including PCS, to be fully developed in non-metropolitan areas. The National Telecommunications and Information Administration ("NTIA") has specifically recognized the need to assure that such regions benefit from technological developments and do not suffer adverse economic and personal consequences.¹³

SCTA has also argued that PCS is a new technology that local exchange carriers should be able to utilize in providing local exchange service. This is particularly critical in non-metropolitan areas (i.e., RSAs and the outlying portions of many MSAs). The detrimental effect on local exchange carriers serving these non-metropolitan areas, if they are unable to implement this technology, would be especially severe.

For these reasons, SCTA advocates that the Commission

¹³National Telecommunications and Information Administration, NTIA Telecom 2000 at p. 90 (1988).

establish a spectrum reserve for local exchange carriers serving RSAs to obtain one of the five 20 MHz licensed blocks for the provision of PCS in their own exchange areas. Under this plan, one block in each RSA would be assigned to the local exchange carriers serving that RSA. Those local exchange carriers would individually use the 20 MHz block within their exchange areas. Specified construction periods and service dates could be required. A condition could be imposed that local exchange carriers use this spectrum only as a part of their exchange service operations and not be permitted to resell it separately. Adoption of this proposal would be especially beneficial to smaller local exchange carriers in the RSAs. They will not be able to compete realistically in any "aftermarket" to obtain licensed spectrum in their exchange area because they would not be able to pay what a licensee could demand for part of a broad licensed area.

For the same reasons that local exchange carriers whose exchange service areas lie within RSAs should be granted a spectrum reserve, the smaller local exchange carriers that serve the outlying areas of many MSAs should be given the same consideration with regard to the spectrum reserve. Specifically, those carriers face the same difficulties in developing a telecommunications infrastructure as the smaller local exchange carriers in RSAs. Furthermore, those carriers will also have the same difficulty in competing for a license to provide PCS and in attempting to obtain spectrum in the "aftermarket" to serve only a limited portion (i.e., their exchange service area) of the licensed area. Therefore, smaller local exchange carriers serving MSAs should

participate in the local exchange carrier spectrum reserve.

IV. Conclusion

SCTA urges the Commission to adopt a definition for PCS that is broad enough to encompass new technological developments but yet specific enough to distinguish PCS from other service offerings. SCTA advocates that 140 MHz be allocated for PCS in the 2 GHz band, divided into five licensed blocks of 20 MHz each, a 20 MHz block allocated for unlicensed narrowband applications and another 20 MHz block allocated for unlicensed broadband applications. Also, SCTA recommends that the PCS licensing areas follow current MSAs and RSAs. Finally, SCTA advocates that local exchange carriers be eligible to become PCS licensees and that interests in cellular systems not be a bar to such participation. In this regard, a spectrum reserve of one of the five 20 MHz blocks should be made available for each local exchange carrier whose exchange area is in an RSA, with similar consideration given to smaller local exchange carriers whose exchange areas are in MSAs.

Respectfully submitted,

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November 9, 1992

CERTIFICATE OF SERVICE

I, Shannon G. Eubanks, hereby certify that a copy of the foregoing Comments of the South Carolina Telephone Association was mailed, postage prepaid, first-class United States mail, this ninth day of November, 1992, to the parties on the attached list.

A handwritten signature in cursive script, reading "Shannon G. Eubanks", is written over a solid horizontal line.

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